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November 12, 2024

Via ECF

Special Master the Hon. Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower, 18th Floor
Philadelphia, PA 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*
USDC, District of New Jersey, No. 1:19-md-2875-RMB

Dear Judge Vanaskie:

In accordance with Your Honor's direction at the October 29, 2024 status conference, I write to inform the Court that the Mylan Defendants are not waiving their jurisdictional rights pursuant to *Lexecon Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998) at this time.¹

Respectfully submitted,

A handwritten signature in black ink that reads "Clem C. Trischler".

Clem C. Trischler

c: All counsel of record (via ECF)

¹ This is in regard to the *Pizzolato*, *Ramirez*, and *Svebek* cases, which were randomly selected by the Court for inclusion in the initial bellwether trial pool. The Mylan Defendants take no position with respect to the *Pate* case based on Mylan's understanding that there is no subject matter jurisdiction in that matter. The Mylan Defendants continue to reserve all rights under *Lexecon* regarding all cases in the MDL proceeding.